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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ANDI KRAJA

Plaintiff,

vs.

BELLAGIO, LLC, a Nevada Corporation;
VINCENT DEFENDANT ROTOLO, an
Individual,

Defendants.

Case No.: 2:15-cv-01983-APG-NJK

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO OBTAIN AN
EXPERT AND SUBMIT AN EXPERT
REPORT AND ORDER**

(SECOND REQUEST)

Hearing Date: January 3, 2020

On September 26, 2019, the Court ordered the parties meet and confer regarding the scheduling of an evidentiary hearing, including a schedule for possible discovery. The parties met and conferred and on October 8, 2019, submitted a Joint Status Report/Stipulation For Proposed Schedule which was approved by the Court on October 9, 2019. **ECF No. 232**. The Stipulation reads in part “Kraja shall have until November 8, 2019 to retain and disclose an expert report regarding the Visual Evidence. Kraja reserves the right to seek additional time to retain and disclose an expert report, should the need for such an extension arise.” **Id. at 2:4-6**. An expert (out of area)

1 has been located and a meeting scheduled for November 11, 2019. It was unknown at the time of the
2 first stipulation how long it would take for the expert to draft a report. To that end, the parties
3 stipulated that Plaintiff may have up to and including November 21, 2019 in which to submit an
4 expert report, but may request additional time should the need for such an extension arise. **ECF No.**
5 **234.**
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7 On November 20, 2019, Plaintiff was informed the expert report would not be ready until
8 December 3, 2019. The parties met and conferred and agreed that Plaintiff may have up to and
9 including December 3, 2019 in which to submit an expert report.
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11 Dated this 20th day of November, 2019.

12 KEMP & KEMP

PISANELLI BICE PLLC

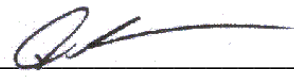
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17 *Attorneys for Plaintiff, Andi Kraja*

Attorneys for Defendant, Bellagio LLC

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19 **IT IS SO ORDERED:**
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22 UNITED STATES DISTRICT JUDGE
23 Dated: November 21, 2019.
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